

VINCENT JOHN BORKOWSKI
and G. JOAN BORKOWSKI
723 Trail Avenue
Frederick, Maryland 21701

COMPLAINANT

VS.

ALL persons having or claiming
to have any outstanding hostile
right in or to the property known as
723 Trail Avenue, Frederick, Maryland

RESPONDENTS

* NO. 31,216 EQUITY
* IN THE CIRCUIT COURT
* FOR FREDERICK COUNTY

*

*

*

*

*

*

*

*

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Vincent John Borkowski and G. Joan Borkowski, his wife, by F. Theodore Elliot, and ELLIOT, NICKLAS & CASTLE, their attorneys, respectfully represents unto your Honorable Court:

FIRST: That heretofore, to wit, on the 9th day of April, 1981, your Petitioner filed their Bill of Complaint to Quiet Title from the Respondents, ALL persons having or claiming to have any outstanding hostile right in or to the property known as 723 Trail Avenue, Frederick, Maryland; that in pursuance thereof an Order of Publication was posted at the Courthouse door until the 13th day of June, 1981, where it was returned by the Sheriff of Frederick County. Such procedure is being performed pursuant to Rule 105.

SECOND: That the Respondents, ALL persons having or claiming to have any outstanding hostile right in or to the property known as 723 Trail Avenue, Frederick, Maryland, have not filed any answer to the Complainant's Bill of Complaint and are in default.

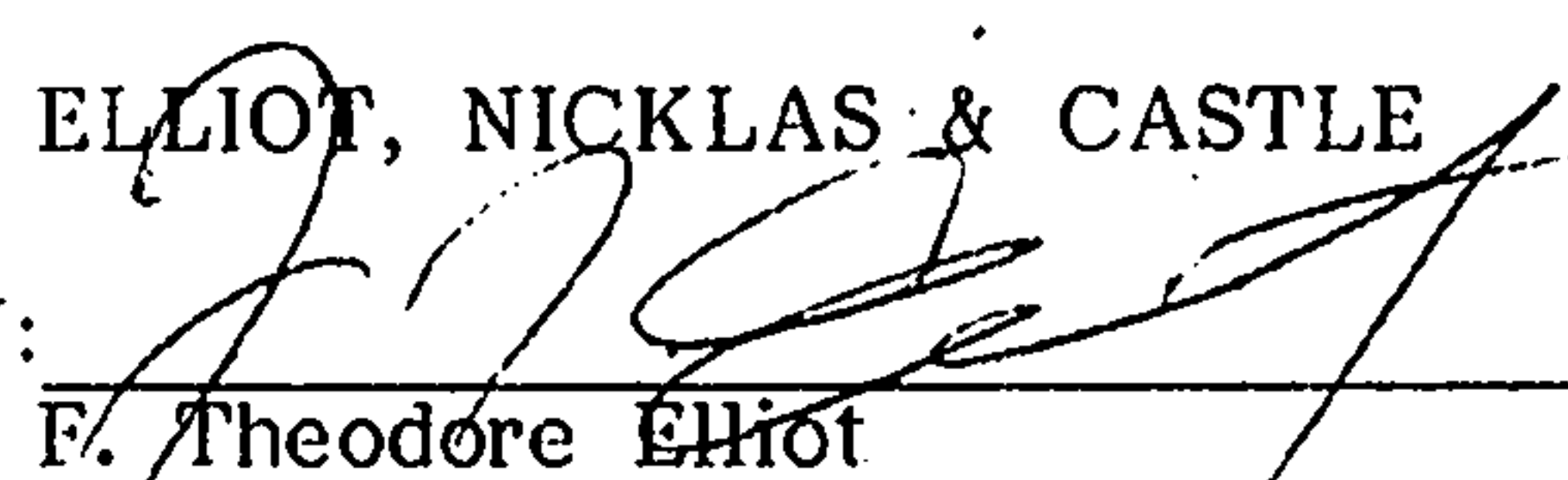
THIRD: That no persons having or claiming to have any outstanding hostile right in or to the property known as 723 Trail Avenue, Frederick, Maryland, are in the military service of the United States nor of any nation allied with the United States.

WHEREFORE, your Petitioners pray for a Decree PRO CONFESSO against the said Respondents, ALL persons having or claiming to have any outstanding hostile right in or to the property known as 723 Trail Avenue, Frederick, Maryland, and leave be granted to your Petitioners to take testimony to support the allegations of said Bill of Complaint.

AND AS IN DUTY BOUND, ETC.

ELLIOT, NICKLAS & CASTLE

BY:


F. Theodore Elliot
Attorneys for Complainant
19 North Court Street
Frederick, Maryland 21701
Telephone: (301) 694-8877